

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE WESTERN DISTRICT OF TEXAS

IN RE: KAREN LYNN HASH

BRENDA KEILY

Plaintiff,

vs.

CASE NO. _____

KAREN LYNN HASH

Defendant.

COMPLAINT

TO THE HONORABLE COURT:

Plaintiff, BRENDA KEILY ("Creditor"), files this Original Complaint objecting to discharge of the Defendant, KAREN LYNN HASH ("Debtor"), and in support thereof, would show the following:

1. Plaintiff, BRENDA KEILY ("Creditor"), an individual residing at 204 Windridge Drive, Niederwald, Texas 78640, is a creditor of the above-named debtor.
2. Defendant, KAREN LYNN HASH ("Debtor"), an individual residing at 1277 HCR 3138 N Hillsboro, Texas 76645, is the Debtor above-captioned proceedings.
3. This is an action under 11 U.S.C.A. § 727(c) and 11 U.S.C.A. § 523 objecting to and asserting exceptions from the discharge of the Defendant Debtor. This court has jurisdiction of this case pursuant to 28 U.S.C.A. § 1334.

4. Attorney for Plaintiff has investigated the actions of Debtor and being satisfied that the proper grounds exist for exceptions from discharge, objects to the granting of discharge of the Debtor. The grounds for such exceptions are set forth in the following paragraph.

5. On or about December 9, 2020, in Hayes County, Texas, Defendant Debtor obtained Plaintiff's money and/or property by false pretenses, a false representation, and/or actual fraud, other than a statement respecting Debtor's or an insider's financial condition. *See* 11 U.S.C.A. § 523 (a)(2). Specifically, Defendant Debtor and her sister, Sandra Critelli, fraudulently transferred Plaintiff's interest in mineral rights and royalties to themselves by forgery of a Mineral Deed and falsifying documents. The falsified and forged documents which fraudulently conveyed Plaintiff's mineral interests to Defendant Debtor and Sandra Critelli, were filed in Upton County, Texas. Thereafter, Defendant Debtor and Sandra Critelli wrongfully received ownership of Plaintiff's mineral interests and fraudulently collected royalty payments belonging to Plaintiff. On December 8, 2022, Plaintiff sued Defendant Debtor and Sandra Critelli for fraud, among other causes of action, under cause number 12-U4982-OTH in the 112th Judicial District Court in Upton County, Texas. Defendant Debtor and Sandra Critelli now seek bankruptcy protection from such fraud and theft committed against Plaintiff. Plaintiff objects to the discharge sought by Defendant Debtor and asserts the exceptions to discharge under 11 U.S.C.A. § 523 (a)(2).

THEREFORE, Plaintiff prays that Defendant Debtor be denied discharge, that the exception(s) to discharge described herein be granted, and that this Honorable Court set the day and date for hearing on this objection to discharge and for all orders and decrees necessary in the premises.

Respectfully submitted:

KEMMY LAW FIRM, P.C.

/s/ Thomas G. Kemmy

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing was served on the following counsel, through the electronic filing manager, on February 3, 2025.

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Bankruptcy Trustee

/s/ Thomas G. Kemmy

Thomas G. Kemmy